

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

GREGORY CHESTER

Case No. 13 CR 774-1

Judge John J. Tharp, Jr.

**MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER GOVERNING
DISCOVERY**

Pursuant to Federal Rule of Criminal Procedure 16(d) and 18 U.S.C. § 3771(a), the United States of America by and through its attorney, GARY S. SHAPIRO, United States Attorney for the Northern District of Illinois, moves for the entry of an agreed protective order, and in support thereof states as follows:

1. The indictment in this case charges defendant with RICO conspiracy, in violation of 18 U.S.C. § 1962(d) (Count One).
2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect law enforcement interests and the privacy interests of third parties.
3. The government has discussed the proposed protective order with counsel for defendant Gregory Chester, who agrees to the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

GARY S. SHAPIRO
United States Attorney

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Dated: October 17, 2013